

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

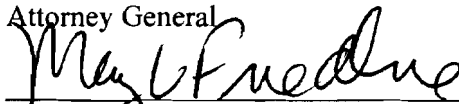
LEONARD C. JEFFERSON,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 04-44 E
)	
WILLIAM WOLFE, ET AL.,)	
)	
Defendants.)	

**DEFENDANTS' AMENDED RESPONSE TO PLAINTIFF'S
INTERROGATORIES AND REQUEST FOR PRODUCTION
OF DOCUMENTS**

12. There was no misconduct report written, but Glenn McQuown did write an Employee Report of Incident dated October 28, 2002, see attached.
13. See document provided in response to number 12 above.
14. Yes, see document provided in response to number 12 above addressed to Captain Bartlett. There were no reports prepared by this Captain.

Respectfully submitted,

THOMAS W. CORBETT, JR.
Attorney General



Mary L. Friedline
Senior Deputy Attorney General
Attorney I.D. No. 47046

Office of Attorney General
6th Floor, Manor Complex
564 Forbes Ave.
Pittsburgh, PA 15219
Phone: (412) 565-3520
Fax: (412) 565-3019

Susan J. Forney
Chief Deputy Attorney General

Date: October 16, 2006

10/06/2006 15:38 FAX 8147569733

SCI ALBION

002

DC-121 Part 3 Revised 5/99 Attachment D 8.7.9		Pennsylvania Department of Corrections Employee Report of Incident		<input type="checkbox"/> Use of Force Occurrence	
To: <i>Cpt. Bartlett</i>		Title: <i>Sh. Lt Commander</i>		Date: <i>10/25/02</i>	Time: <i>1437</i>
From (Name Printed): <i>McQuinn</i>		Title: <i>FCPD</i>		Location of Incident: <i>Chapel offices</i>	
Employee Signature: <i>Glenn McQuinn</i>			Type of Incident: <i>Inflammatory material</i>		
Inmates Involved (Name and Number)		Staff Involved (Name and Title)		Witnesses	
<i>Jefferson, L. CL-4185</i>		<i>Brannon, Barbara</i> <i>Anderson, Michael</i>		<i>Abdalla, Elhafi</i>	
CONFIDENTIAL EYES ONLY OF ADDRESSEE NOT FOR DISTRIBUTION PROPERLY SECURE THIS DOCUMENT					

1. Detailed description of the occurrence.

Minister Anderson requested Clerk Brannon make a copy of the attached document. While no attempt has been made to disseminate this material it is of an inflammatory nature. Inmate Jefferson reports to Inmate Abdalla that he was reading the document when Minister Anderson requested first to read it and then gained permission & material to copy. Inmate Jefferson was informed that the material was inappropriate - the poetry portion - and that it is NOT to be distributed.

OCT 29 2002

cc: *MA Bartlett*
SCI ALBION
02 OCT 28 PM 4:18

SPB Document

[illegible]

21ST CENTURY'S DAWN'S EARLY LIGHT

My Country tis of thee
This is about your reality
By the 21st Century's Dawn's early light
There ain't no justice for you here if you ain't white

Sweet land of librtty
Bitter was the taste of your slavery
And that pitid tste remains strong in all of our mouths
As we now see you lynching us downtown in your courthouses

The whole world wtched you beat down Rodney King
Then we saw white jurors who could not see what we were seeing
With their open ees their closed minds saw the police were right
You know there ain't no justice for you here if you ain't white

Today's lynchings are performed at Police State-style trials
Perpetuating this injustice American-style
Highlighting the nstated semantic reality
That lynchings don't require bodies hanging from the trees

Oh say can you see
Strange fruit no longer hangs in America's trees
Now in the land of the free the home of the brave
Prisons conceal the lynched children of America's slaves

Remember Martin told us to let Freedom ring
So my Country tis of thee that I sing
Now in the land of the free the home of the brave
Prisons conceal the lynched children of America's slaves

10/06/2006 15:40 FAX 8147569733

SCI ALBION

SELF-HEALING

Practiced before man began recording history
 The art of self-healing ain't no real mystery
 The best doctors with perfected visions in their minds
 Can't help those who're determined to remain blind

Those who go out of their way to trivialize
 Their lost of focus upon a very important prize
 Living a nightmare unaware running out of time
 Oblivious victims of State-sponsored hate crimes

The only thing missing in their courtrooms is their hanging tree
 And justice for people with black skin like you and me
 Courts remain one of America's most racist places
 Please don't try to deny it when its
 right up in all of our faces

One hundred and seventeen per one hundred thousand
 is White folk's incarceration rate
 One thousand six hundred and seventy-three per hundred thousand
 is Black's rate in this racist state
 Doubt has been dispelled by computerized light
 Black's incarceration rate is fourteen times that of Whites

Social scientist produce these stats then they tell you humongous lies
 Which you'll accept as true if you're determined to remain blind
 Will you act upon the facts upon which these stats stand
 To end State-sponsored hate crimes against the Black man

Even blind eyes must see our apathy as being beyond strange
 Educated and wealthy now what are we doing to make this situation change
 Could it be that doctorate degrees and surplus personal wealth
 Destroy the vision of those who have not learnt
 we must show love to ourselves

Practiced before man began recording history
 The art of self-healing ain't no real mystery
 The best doctors with perfected visions in their minds
 Can't help those who're determined to remain blind

380
100

Native

Jazette

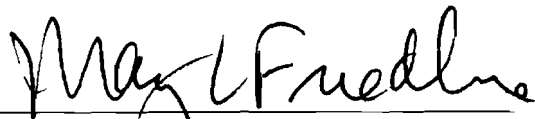
CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing

Defendants' Amended Response to Plaintiff's Interrogatories and Request for Production of

Documents was served upon the following, by first-class mail this October 16, 2006.

Leonard C. Jefferson, CL-4135
State Correctional Institution
At Albion
10745 Route 18
Albion, PA 16475

A handwritten signature in black ink, appearing to read "Mary L. Friedline", written over a horizontal line.

Mary L. Friedline
Senior Deputy Attorney General